

From: [Hatfield, William S.](#)
To: [Broderick, John \(ENRD\)](#)
Cc: [Yacovone, Krista](#); [Otero, Camille V.](#)
Subject: Re: meeting confirmation 10/29
Date: Friday, October 25, 2019 2:20:43 PM

John:

Our client already has confirmed travel plans to come to Newark next week and had been traveling abroad. We should have an offer to you by Monday and believe it will be helpful to meet.

Have you received settlement offers from Praxair or G-I?

Bill

William S. Hatfield, Esq.

Director, Environmental Law Department

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On Oct 25, 2019, at 12:38 PM, Broderick, John (ENRD)
<John.Broderick@usdoj.gov> wrote:

Thanks, Bill.

Can we expect an offer later today? Each party's offer will help us to assess whether it's worth everyone's time to head to New York for the meetings and/or how productive they might be.

John

From: Hatfield, William S. <WHatfield@gibbonslaw.com>
Sent: Friday, October 25, 2019 10:56 AM
To: Broderick, John (ENRD) <JBroderick@ENRD.USDOJ.GOV>
Cc: Yacovone, Krista <yacovone.krista@epa.gov>; Otero, Camille V. <COtero@gibbonslaw.com>
Subject: RE: meeting confirmation 10/29

Dear John:

I received your voice mail. We confirm that IES will be presenting a settlement offer in the LCP case, which is still in process. We apologize for the delay.

Thank you for your patience.

Bill

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From: Broderick, John (ENRD) <John.Broderick@usdoj.gov>

Sent: Friday, October 25, 2019 10:27 AM

To: Hatfield, William S. <WHatfield@gibbonslaw.com>

Cc: Yacovone, Krista <yacovone.krista@epa.gov>

Subject: RE: meeting confirmation 10/29

Dear Bill,

In advance of next Tuesday's meeting we requested that IES present a settlement offer by yesterday. Does IES intend to submit an offer? Please give me a call on my cell at 202.532.3205 to discuss.

Thanks,

John

From: Broderick, John (ENRD)

Sent: Tuesday, October 8, 2019 11:18 AM

To: 'Hatfield, William S.' <WHatfield@gibbonslaw.com>

Cc: Yacovone, Krista <yacovone.krista@epa.gov>

Subject: meeting confirmation 10/29

Dear Bill,

Confirming the 10/29/19 date for our meeting, at 1 pm at EPA's Region 2 offices. Krista will send out an outlook invitation with pertinent details. Praxair and G-I are both planning on bringing their clients.

To facilitate a productive meeting, we have requested an offer within three business days of the meeting. Please submit any settlement offer to Krista and me by 10/24. The United States will only consider good faith settlement offers, and if we do not receive such offers from all parties we will reevaluate whether a three-party meeting would be constructive.

Thanks, and don't hesitate to reach out with any questions.

John

John Broderick
Trial Attorney
Environmental Enforcement Section
U.S. Department of Justice
(202)305-0302

[<image001.jpg>](#)

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